

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)**

In re:

Case No. 23-16969

Roman Catholic Archbishop of Baltimore,

Chapter 11

Debtor.

Judge Michelle M. Harner

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**WITHDRAWAL OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'  
LIMITED OBJECTION TO DEBTOR'S MOTION FOR ENTRY OF INTERIM AND  
FINAL ORDERS: (I) AUTHORIZING THE DEBTOR TO (A) PAY CERTAIN  
PREPETITION WAGES, BENEFITS, AND OTHER COMPENSATION AND (B)  
CONTINUE EMPLOYEE COMPENSATION AND BENEFITS PROGRAMS; AND (II)  
GRANTING RELATED RELIEF**

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The Official Committee of Unsecured Creditors (the "Committee") submits this withdrawal of its Objection [ECF No. 133], which was filed in response to the *Debtor's Motion for Entry of Interim and Final Orders: (I) Authorizing The Debtor To (A) Pay Certain Prepetition Wages, Benefits, and Other Compensation And (B) Continue Employee Compensation and Benefits Programs; And (II) Granting Related Relief* (the "Wage Motion") [ECF No. 7]. The Committee submits this withdrawal based on the following:

1. On September 29, 2023 (the "Petition Date"), the Debtor commenced this case under Title 11 of the United States Code (the "Bankruptcy Code"). The Debtor continues to operate its business and manage its properties as debtor in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

2. On the Petition Date, the Debtor filed the Wage Motion seeking, inter alia, emergency relief to pay employee wages, benefits, and other compensation accrued prior to the Petition Date pursuant to Bankruptcy Code §§ 105(a), 363(b), 507(a), 1107(a), and 1108, and Bankruptcy Rules 6003 and 6004 for entry of interim and final orders [ECF Doc. 7].

3. The Committee filed an Objection [ECF Doc. 133], dated October 30, 2023, to the Wage Motion requesting clarification of the following:

- In seeking to assume its pre-Petition Date employee wage and benefit programs, the Debtor will not assume liabilities or administrative costs associated with any of the Debtor's affiliated Catholic organizations;
- The Debtor identifies any employees, including priests, that are shared or common among itself and any of its affiliated Catholic organizations;
- The Debtor's executives, i.e., the Archbishop and any auxiliary bishops, are not receiving any remuneration in excess of the statutory cap under 11 U.S.C. § 507(a)(4);
- Any charitable contributions allowed under the Final Order represent only an employee's elective contributions and are not voluntary or matched contributions from the Debtor; and
- No person accused by any Survivor of perpetrating sexual assault will receive any remuneration or other benefit from the Debtor as a result of the authority granted under the Final Order.

4. On November 1, 2023, counsel for the Debtor provided the foregoing adequate assurance as well as supplemental information responsive to the Committee's requests.

5. Accordingly, the Committee withdraws its Objection to the Debtor's Wage Motion based on the assurances and information supplied by Debtor's counsel.

Date: November 5, 2023

Respectfully submitted,

/s/ Alan M. Grochal

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*Proposed Counsel for the Official  
Committee of Unsecured Creditors*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 5th day of November, 2023, a true and correct copy of the foregoing ***WITHDRAWAL OF LIMITED OBJECTION*** was filed and served via the Court's CM/ECF e-filing system on all parties of record:

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